

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

IN RE: AQUEOUS FILM-FORMING FOAMS  
PRODUCTS LIABILITY LITIGATION

Master Docket No.: 2:18-mn-2873-RMG

**This document relates to:**  
See Exhibit A Attached Hereto

**STIPULATION OF DISMISSAL WITH PREJUDICE PURSUANT TO FEDERAL RULE  
OF CIVIL PROCEDURE 41(a)(1)(A)(ii)**

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Plaintiffs in the actions identified in Exhibit A attached hereto and Defendants Tyco Fire Products LP (“Tyco”), Chemguard, Inc. (“Chemguard”), and ChemDesign Products, Inc. (“ChemDesign”) hereby stipulate and agree to a dismissal with prejudice of all Plaintiffs’ Claims against Tyco, Chemguard, ChemDesign, and any other Released Parties<sup>1</sup> in the actions identified in Exhibit A pursuant to Plaintiffs’ decision to participate in the Settlement Agreement Between Public Water Systems and Tyco dated April 12, 2024 (the “Settlement Agreement”), which received final approval on November 22, 2024, from the Court overseeing *In Re: Aqueous Film-Forming Foams Products Liability Litigation*, MDL No. 2:18-mn-2873 (D.S.C.).

Each party shall bear its own costs.

---

<sup>1</sup> Unless otherwise indicated, all capitalized terms in this motion have the meaning given to them in the Settlement Agreement.

Dated: April 25, 2025

Respectfully submitted,

/s/ Andrew Croner

Andrew Croner  
NAPOLI SHKOLNIK, PLLC  
360 Lexington Avenue, 11<sup>th</sup> Fl.  
New York, New York 10017  
(212) 397-1000  
acroner@napolilaw.com

*Counsel for Plaintiffs Listed on Exhibit A*

/s/ David E. Dukes

David E. Dukes  
Nelson Mullins Riley & Scarborough LLP  
1320 Main Street / 17th Floor  
Post Office Box 11070 (29211-1070)  
Columbia, SC 29201  
david.dukes@nelsonmullins.com  
(803) 799-2000

/s/ Liam J. Montgomery

Liam J. Montgomery  
WILLIAMS & CONNOLLY LLP  
680 Maine Ave SW  
Washington, DC 20024  
(202) 434-5000  
lmontgomery@wc.com

*Counsel for Defendants Tyco Fire Products LP  
and Chemguard, Inc.*

/s/ Jonathan B. Blakely

Jonathan B. Blakley  
Gordon Rees Scully Mansukhani  
One North Wacker, Suite 1600  
Chicago, IL 60606  
(312) 619-4915  
jblakley@grsm.com

*Counsel for ChemDesign Products, Inc.*